IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

X CORP.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
WORLD FEDERATION OF	§	Case No. 7:24-cv-00114-B
ADVERTISERS; MARS, INCORPORATED;	§	
CVS HEALTH CORPORATION; ØRSTED	§	
A/S; TWITCH INTERACTIVE, INC.;	§	
NESTLÉ S.A.; NESTLE USA, INC.;	§	
ABBOTT LABORATORIES; COLGATE	§	
PALMOLIVE COMPANY; LEGO A/S;	§	
LEGO BRANDS RETAIL, INC.;	§	
PINTEREST, INC; TYSON FOODS, INC.;	§	
SHELL PLC; SHELL USA, INC.; and	§	
SHELL BRANDS INTERNATIONAL AG,	§	
	§	
Defendants.	§	

AMENDED CONDITIONAL MOTION FOR SEVERANCE BY DEFENDANTS SHELL BRANDS INTERNATIONAL AG, NESTLÉ S.A., AND LEGO A/S

For the reasons explained in their simultaneously filed Brief, Defendants Shell Brands International AG, Nestlé S.A., and LEGO A/S respectfully ask this Court for severance from any transfer of this matter to the U.S. District Court for the Southern District of New York (or alternatively the Dallas Division of the Northern District of Texas), pursuant to Federal Rule of Civil Procedure 21.¹

¹ This Amended Conditional Motion for Severance (the "Motion") replaces the previous Motion for Conditional Severance filed (Dkt. 183) because Defendant Shell plc, who also joined in the original motion for conditional severance, was subsequently dismissed by Plaintiff X Corp. *See* NOTICE OF DISMISSAL OF CLAIMS AGAINST SHELL PLC PURSUANT TO FRCP 41(a)(1)(A)(i). Dkt. 186. This Motion is filed subject to and without waiver of the personal jurisdiction and improper venue motions previously filed. See Dkt. 142 (Shell Brands International AG's Mot. to Dismiss), 145 (LEGO A/S's Mot. to Dismiss), & 163 (Nestlé S.A.'s Mot. to Dismiss). The arguments and relief requested herein, and in the accompanying Brief in Support,

Defendants Shell Brands International AG, Nestlé S.A., and LEGO A/S move for severance subject to and conditioned upon the Court's decision to consider Defendants Mars, Inc., CVS Health Corp., Nestle USA, Inc., Abbott Laboratories, Colgate Palmolive Co., LEGO Brand Retail, Inc., and Pinterest, Inc.'s motion to transfer this case before consideration of Defendants Shell Brands International AG's, Nestlé S.A.'s, and LEGO A/S's pending motions to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3).

Dated: July 2, 2025 Respectfully submitted,

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Attorneys for Defendant Shell Brands

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apply equally to the requested transfer to the Southern District of New York, or alternatively, to the Dallas Division.

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CERTIFICATE OF SERVICE

I certify that on July 2, 2025, a true and correct copy of the foregoing instrument was served on all counsel of record using the Court's electronic filing system.

Dated: July 2, 2025 Respectfully submitted,

By: /s/ Carlos R. Rainer

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CERTIFICATE OF COMPLIANCE

I certify that Defendants Shell Brands International AG's, Nestlé S.A.'s, and LEGO A/S's Amended Conditional Motion for Severance complies with LR 7.2.

Dated: July 2, 2025 Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Prior to filing this Amended Conditional Motion for Severance, Plaintiff X Corp. was apprised of the MTT Defendants' Motion to Transfer and this separate Motion for Severance and advised that it opposes both Motions. The MTT Defendants and all other Defendants do not oppose this Motion for Severance.

Dated: July 2, 2025 Respectfully submitted,

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